

1 Case 1:06-cv-00912-LG-JMR Document 217-23 Filed 12/17/08 Page 1 of 4
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 SOUTHERN DIVISION

4 KASEY D. ALVES PLAINTIFF
5 VERSUS CAUSE NO. 1:06cv912 LG-JMR
6 HARRISON COUNTY MISSISSIPPI, BY AND
7 THROUGH THE BOARD OF SUPERVISORS;
HARRISON COUNTY SHERIFF'S DEPARTMENT;
SHERIFF GEORGE PAYNE, JR.; AND
HEALTH ASSURANCE, LLC DEFENDANTS

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13 **DEPOSITION OF GAYE HARTLEY**
14 Taken at the office of Woodrow Pringle,
15 2217 Pass Road, Gulfport, Mississippi,
beginning on Tuesday, January 15, 2008
at 10:30 a.m.

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22 **REPORTED BY:**

23 CRYSTAL LYNN MORRIS, CSR #1704
24 BAILEY, KEENLANCE & ASSOCIATES
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25 Gulfport, Mississippi 39502
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ORIGINAL

CRYSTAL L. MORRIS, CSR (228) 424-2047



2 or in the block and we went down there and he was in
3 full-blown seizure and then he proceeded to go into
4 cardiac arrest and I initiated CPR.

5 Q. Okay.

6 A. And to no avail.

7 Q. Do you know if Mr. Smith was involved
8 in an altercation with any of the jailers?

9 A. Not at the time. There has been
10 speculation and accusations that he had been. I have
11 not been notified of any depositions or lawsuits
12 pending.

13 Q. All right. Deputy you observe any
14 physical injuries to Mr. Smith?

15 A. No, sir.

16 Q. During the year and a half that you
17 worked at the Harrison County Jail did you ever
18 observe any instances where you felt an inmate had
19 been abused by a jailer?

20 MR. MCRANEY: Object to form.

21 THE WITNESS: Pardon. I was listening to him
22 and you.

23 BY MR. PRINGLE, III:

24 Q. That's okay. During the year
25 and-a-half that you worked at the Harrison County Jail

2 been abused by an officer?

3 MR. MCRANEY: Same objection. She can
4 answer.

5 THE WITNESS: Yes.

6 BY MR. PRINGLE, III:

7 Q. Okay. Do you know was it one
8 occasion, many occasions, or how many?

9 MR. MCRANEY: Object to the form.

10 MR. PRINGLE, III: Go ahead.

11 THE WITNESS: Several.

12 BY MR. PRINGLE, III:

13 Q. All right. On the instances where
14 you did observe this conduct did you report it?

15 A. I may have mentioned it to one of the
16 sergeants.

17 Q. Do you remember who the sergeant was?

18 A. It may have been Sergeant Foster.

19 Q. Okay. All right. Did you make any
20 type of written complaint?

21 A. No, sir, not that I recall.

22 Q. All right. Did you make any record
23 of what you observed in any of your records?

24 A. It would have been documented, the
25 injuries that were -- of any injuries on the inmates.

2 some of the inmates and the injuries they received?

3 MR. MCRANEY: Object to the form but you can
4 answer.

5 THE WITNESS: Yes, sir.

6 BY MR. PRINGLE, III:

7 Q. Okay. All right. So you would treat
8 the inmate and note the injuries in the chart; is that
9 correct?

10 A. Yes, sir.

11 Q. Would you also note what the inmate
12 had told you had happened?

13 A. Yes, sir.

14 Q. And that would be in the medical
15 chart?

16 A. Yes, sir.

17 Q. Okay. All right. And this occurred
18 on several occasions?

19 A. Yes, sir.

20 Q. All right. And were you asked about
21 this by the Department of Justice also?

22 A. No, sir.

23 Q. The only case they questioned you
24 about was the Smith case?

25 A. Yes, sir.